

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA,

-against-

ISKYO ARONOV,  
MICHAEL KONSTANTINOVSKIY,  
TOMER DAFNA, AVRAHAM TARSHISH  
And MICHAEL HERSKOWITZ,

Defendants.  
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**NOTICE OF MOTION  
TO DISMISS INDICTMENT**

Case #: 1:19-cr-00408-MKB(5)

**PLEASE TAKE NOTICE**, that upon the annexed Affirmation of TODD D. GREENBERG, ESQ., affirmed the 30<sup>th</sup> day of April, 2021, and upon the Indictment filed herein, Defendant Michael Herskowitz will move this Court, Honorable Margo K. Brodie, U.S.D.J., at the United States Courthouse, Eastern District of New York, on a date set by the Court ,or as soon thereafter as Counsels can be heard, for an Order pursuant to Rule§12(b)(2), (3) (B) (v) of the Federal Rules of Criminal Procedure granting:

A. Dismissal of the Indictment on the ground that the Indictment fails to give Notice of the criminal acts allegedly committed as required by Due Process of Law.

AND for such other and further relief as to this Court may deem just proper.

Dated: Forest Hill, New York  
April 29, 2021

Respectfully Submitted,

  
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Todd D. Greenberg. Esq.

ADDABBO & GREENBERG  
Attorneys for Defendant  
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Tel. 718-268-0400

TO: Clerk of the Court (MKB)  
All Counsel (By ECF)